

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

This Document Relates To:
ALL CASES

**DEFENDANTS' RULE 7.1(F)
CERTIFICATE OF COMPLIANCE**

I, Benjamin W. Hulse, certify that the Reply ("Reply Memorandum") in Support of Defendants' Motion for Reconsideration of the Court's December 13, 2017 Order on General Causation complies with the limits of Local Rule 7.1(f), in connection with the Court's February 19, 2019 Docket Text Order granting an additional 2,500 words, and with the type-size limit of Local Rule 7.1(h).

I further certify that, in preparation of the above document, I used Microsoft Word 2016, and that this word processing program has been applied specifically to include all text, including headings, footnotes, and quotations in the following word count.

I further certify that the above-referenced Reply Memorandum contains 4,999 words, and that with Defendants' initial Memorandum of 9,494 words, the two documents combined contain 14,493 words.

Dated: March 14, 2019

Respectfully submitted,

s/ Benjamin W. Hulse

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